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FEDERAL COMMUNICATIONS COMMISSION January 6, 1993 OFFICE OF THE SECRETARY

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street N.W., Room 222 Washington, DC 20554

JAN 8 1993

FCC - MAIL ROOM

Dear Ms. Searcy:

It has been brought to my attention that the cover letter (dated November 25, 1992 and delivered via Federal Express on November 27, 1992) I submitted with the original and four copies of the Comments of Wheeler Broadcasting, Inc. and Midwest Dimensions, Inc. opposing Docket 92-228 inadvertantly had the wrong Docket number (92-212 instead of 92-228). The Comments submitted have the correct Docket number on and in them. After a conversation with a member of your staff, I am submitting a duplicate original and four copies of the previously submitted Comments. Please forward these to the proper personnel.

Should there be any questions concerning this matter, please contact the undersigned

Respectfully,

Bruce C. Herzog

Broadcast Engineering Consultant

1435 Knapp Street Oshkosh, WI 54901

True C. Huson

(414) 426-2961

No. of Copies rec'd__ List A B C D E

JAN - 8-1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY
November 25, 1992

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street N.W., Room 222 Washington, DC 20554 Towns Sant Sant States

JAN 8 1993

FCC - MAIL ROOM

Dear Ms. Searcy:

I am transmitting herewith an original and four copies of the Comments of Wheeler Broadcasting, Inc. and Midwest Dimensions, Inc. opposing Docket 92-212.

Should there be any questions concerning this matter, please contact the undersigned.

Respectfully,

Pun C. Hugge Bruce C. Herzog

Broadcast Engineering Consultant 1435 Knapp Street

Oshkosh, WI 54901

(414) 426-2961

RECEIVED

JAN - 8 1993

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

FEDERAL COMMUNICATIONS COMMISSION

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

IN THE MATTER OF

AMENDMENT OF SECTION 73.202(B),]
TABLE OF ASSIGNMENTS,]
F.M. BROADCAST STATIONS,]
(ALLOUEZ, WISCONSIN)

DOC-92-228 FIECE IVED

JAN 8 1993

FCC - MAIL ROOM

To the Commission:

COMMENT TO PROPOSED RULEMAKING

Wheeler Broadcasting, Inc. ("Wheeler"), licensee of F.M. radio broadcast station WOWN at Shawano, Wisconsin, and Midwest Dimensions, Inc. ("Midwest"), licensee of F.M. radio broadcast station WPKR at Waupun, Wisconsin, hereby jointly submit a counter-proposal to the Commission's Notice of Proposed Rulemaking ("NPRM") to amend the F.M. table of assignments, section 73.202(b) of the Commission's Rules and Regulations as follows:

| CITY | EXISTING | PROPOSED |
|--------------------|----------|----------|
| Shawano, Wisconsin | 257-C3 | 295-C3 |
| Oconto, Wisconsin | 296-A | 246-A |
| Escanaba, Michigan | 246-C | 245-C |
| Allouez, Wisconsin | NONE | NONE |

In support of these Comments to a Petition for Rulemaking, Wheeler and Midwest respectfully submit an engineering statement prepared by Bruce Charles Herzog, attached hereto as Appendix 1.

Michael R. Walton has petitioned the commission to allocate channel 294-C3 at Allouez, Wisconsin. Wheeler and Midwest hereby request that the Commission make the channel substitutions requested in these comments and modify the license of F.M. radio station WGLQ at Escanaba, Michigan to specify operating on Channel 245-C, modify the license of F.M. radio station WOCO-FM at Oconto, Wisconsin to operate on Channel 246-A, and change the allotment of F.M. radio station WOWN at Shawano, Wisconsin (FCC File Number BPH-910607IB) to Channel 295-C3 so that WOWN may eliminate its short spacings to F.M. radio broadcast stations WBNZ at Frankfort, Michigan and to F.M. radio broadcast station WPKR at Waupun, Wisconsin.

Allouez, Wisconsin is a suburb of Green Bay,
Wisconsin. The Green Bay area is currently being served by 3
high-powered (25 KW or more) commercial F M. radio broadcast
stations with a fourth station having a construction permit
for 25,000 watts and 4 applicants for a Class C3 allocation to
a nearby community whose restricted transmitter location will
allow it to serve the Green Bay area. Wheeler and Midwest
believe that the public can be better served by eliminating
interference to existing stations than by adding an additional
station to an area that is already being adequately served.

If the Commission goes forward to make the assignments hereby petitioned, Wheeler shall immediately make application to the Federal Communications Commission for

a construction permit to make the channel change of WOWN on its new channel.

If such applications are granted by the Commission the petitioner shall promptly construct the permitted facility.

Respectfully submitted,

Вv

Ray L. Wheeler

Chairman

Wheeler Broadcasting, Inc.

1456 E. Green Bay Street

Shawano, WI 54166

(715) 524-2194

James R Coursolle

President

Midwest Dimensions, Inc.

P.O. Box 3450

Oshkosh, WI 54903

(414) 236-4242

APPENDIX 1

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION RECEIVED

JAN 8 1993

FCC - MAIL ROOM

ENGINEERING STATEMENT

IN THE MATTER OF: AMENDMENT OF SECTION /3.202(B), 1 DOC-92-228 TABLE OF ASSIGNMENTS, F.M. BROADCAST STATIONS, (ALLOUEZ, WISCONSIN)

PREPARED FOR:

WHEELER BROADCASTING, INC. AND MIDWEST DIMENSIONS, INC. NOVEMBER 24'TH, 1992

PREPARED BY:

BRUCE CHARLES HERZOG BROADCAST ENGINEERING CONSULTANT 1435 KNAPP STREET oshkosh, wi 54901

(414) 426-2961

HECEVED

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JAN 8 1993

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- 4. TABLE II, SHAWANO, WISCONSIN CHANNEL 295-C3 STUDY, Pages 1 and 2
- 5. TABLE 111, OCONTO, WISCONSIN CHANNEL 246-A STUDY
- 6. TABLE IV, ESCANABA, MICHIGAN CHANNEL 245-C STUDY, Pages 1 and 2

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The same of the sa

STATE OF WISCONSIN)

JAN 8 1993

COUNTY OF WINNEBAGO)

FOO-MAIL ROOM

CITY OF OSHKOSH

BRUCE CHARLES HERZOG, BEING FIRST DULY SWORN STATES:

THAT HE IS AN BROADCAST ENGINEERING CONSULTANT WITH OFFICES AT 1435 KNAPP STREET; OSHKOSH, WISCONSIN 54901.

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL COMMUNICATION COMMISSION IN WASHINGTON, D.C.

THAT HE HAS PREPARED NUMEROUS AN, FM, TELEVISION, TRANSLATOR AND MICROWAVE RADIO APPLICATIONS WHICH HAVE BEEN PROCESSED TO GRANT BY THE F C.C.

THAT ALL CALCULATIONS AND/OR MEASUREMENTS AND EXHIBITS IN THE ACCOMPANYING REPORT WERE MADE BY HIM PERSONALLY OR UNDER HIS DIRECTION, AND THAT ALL FACTS CONTAINED HEREIN ARE TRUE OF HIS PERSONAL KNOWLEDGE OR BELIEF, AND ON SUCH STATEMENTS MADE ON BELIEF, THEY ARE BELIEVED TO BE TRUE.

AFFIANT

SUBSCRIBED AND SWORN BEFORE ME THIS 24'TH OF NOVEMBER, 1992.

NOTARY PUBLIC

Diane Coursolle NOTARY PUBLIC

DATE OF COMMISSION EXPIRATION: My Commission Expires Sept. 15, 1996

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

AMENDMENT OF SECTION 73.202(B), DOCKET 92-228ECEIVED TABLE OF ASSIGNMENTS, SECTIONS, CALLOUEZ, WISCONSIN)

ENGINEERING STATEMENT

FCC - MAIL ROOM

Wheeler Broadcasting, Inc. ("Wheeler"), licensee of F.M. radio broadcast station WOWN at Shawano, Wisconsin, and Midwest Dimensions, Inc, ("Midwest"), licensee of F.M. radio broadcast station WPKR at Waupun, Wisconsin have retained the services of Bruce Charles Herzog, Broadcast Engineering Consultant, to conduct engineering studies and prepare necessary statements and exhibits to oppose the petition of Michael R. Walton ("Walton") to amend section 73.202(b) of the Commission's Rules and Regulations, to assign F.M. channel 260-C3 at Allouez, Wisconsin.

WOWN is currently short spaced to F M. radio broadcast stations WNBZ at Frankfort, Michigan and WPKR at Waupun, Wisconsin. In order to eliminate these short spacings and any possible interference thereby resulting, a channel search was conducted to see if any fully spaced F M. channels could by substituted for Channel 257-C3 at Shawano, Wisconsin. The only channel that could be substituted at the WOWN currently authorized site is Channel 295-C3. This channel substitution could only be made by changing the channel allotment of WOCO-FM

at Oconto, Wisconsin which is currently on Channel 296-A and by having the Commission dismiss the proposed allocation by Walton of Channel 294-C3 at Allouez, Wisconsin.

Allouez, Wisconsin is a suburb of Green Bay, Wisconsin. Table I shows a listing of F.M. and A.M. radio broadcast stations serving the Green Bay, Wisconsin area. Wheeler and Nidwest believe the Green Bay area is currently being adequately served with the existing stations.

Table II is a Channel Study for Channel 296-C3 at Shawano, Wisconsin. As can be evidenced from the channel study WOWN could change from Channel 257-C3 to Channel 295-C3 if Walton's petition is denied and WOCO-FM moves to another channel.

Table III is a Channel Study for Channel 246-A at Oconto, Wisconsin. As can be evidenced from the channel study WOCO-FM could change from Channel 296-A to Channel 246-A if WGLQ at Escanaba, Michigan changes from Channel 246-C to Channel 245-C.

Escanaba, Michigan. As can be evidenced from the channel study the only problem with WGLQ changing to this channel is a diminimus short spacing to WBDK at Algoma, Wisconsin at the site applied for (FCC File Number BPH-920624IC). WBDK has agreed in principle to relocate its transmitter site should Wheeler and Midwest's counter-proposal to Walton's petition for rulemaking be granted.

Calculations of distance separations set forth

in the attached Tables were conducted in accordance with methodology set forth in Section 73.208 of the Commission's rules.

Wheeler and Midwest believe that the public interest, convenience and necessity would be better served by reducing interference in the F.M. band than by adding an addition radio station in the Green Bay, Wisconsin area.

Respectfully submitted,

Bue E. Hugra

Bruce Charles Herzog

November 24 th, 1992

TABLE I

F.M. RADIO STATIONS SERVING THE GREEN BAY AREA

| CITY OF LICENSE | CALL SIGN | STATUS | CLASS | POWER |
|-----------------|-------------|------------------------|-------|--------|
| APPLETON, W1 | WAPL-FM | LIC | С | 100 KW |
| DE PERE, WI | WJLW | UPGRADE CP | C3 | 25 KW |
| GREEN BAY, WI | WYPD | NEW CP | C 1 | 50 KW |
| GREEN BAY, WI | WPNE-FM | LIC | C 1 | 100 KW |
| GREEN BAY, WI | VORO | NEW CP | A | 6 KW |
| GREEN BAY, WI | WGBW | UPGRADE CP | C3 | 16 KW |
| GREEN BAY, WI | WQLH | LIC | C 1 | 100 KW |
| GREEN BAY, WI | WIXX | LIC | С | 100 KW |
| KAUKAUNA, WI | ALLOC | 4 APPLICATIONS ON FILE | С3 | 25 KW |

A.M. RADIO STATIONS SERVING THE GREEN BAY AREA

| GREEN | BAY, | WI | WDUZ | LIC |
|-------|------|----|------|-----|
| GREEN | BAY, | WI | WGEE | LIC |
| GREEN | BAY, | WI | WNFL | LIC |

TABLE II

CHANNEL STUDY

JOB TITLE: SHAWANO, WISCONSIN

CHANNEL: 295

FREQUENCY: 106.9 MHZ

CLASS: C3

COORDINATES: 44°-45'-14" N.L. 88°-20'-01" W.L. (WOWN AUTHORIZED SITE)

PETITIONER: WHEELER BROADCASTING, INC. & MIDWEST DIMENSIONS, INC.

DATE: NOVEMBER 22'ND, 1992

| CALL STATUS | CITY STATE FCC FILE | CHAN CLS | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|----------------|---|--------------------|----------------------|-----------------------|-----------------|-----------------|----------------|
| WJMR APP | PESHTIGO WI BMPH-9001301E | | 2.89 139.0 | 45-07-19 87-51-07 | 42.9 | 55.84 43.84 | 12.0 CLEAR |
| WJMR CP | PESHTOGO W1 BPH-881024MB | 241 A | 3.0 70.0 | 45-05-58 87-40-35 | 53.5 | 64.55 52.55 | 12.0 CLEAR |
| PRM ** DELET | PESHTIGO WI DOC-91-240 ION OF THIS CHANNEL PR | 241 A OPOSED | ** | 45-05-58 87-40-35 | 53.5 | 64.55 52.55 | 12.0 CLEAR |
| PRM ** ADDIT | PESHTIGO WI DOC-91-240 ION OF THIS CHANNEL PR | | ** | 45-07-19 87-51-07 | 42.9 | 55.84 38.84 | 17.0 CLEAR |
| NEW APP | STEPHENSON MI BPH-910719MB | 292 C2 | 50.0 150.0 | 45-16-45 87-40-26 | 41.7 | 78.18 22.18 | 56.0 CLEAR |
| ALLOC | STEPHENSON MI DOC-89-500 | 292 C2 | | 45-24-54 87-36-24 | 37.9 | 93.13 37.13 | 56.0 CLEAR |
| WLJY LIC | MARSHFIELD WI BLH-800213AD | 293 C1 | 100.0 244.0 | 44-38-41 89-51-11 | 264.2 | 121.04 45.04 | 76.0 CLEAR |
| PRM | ALLOUEZ WI | 294 C3 | | 44-30-50 88-02-57 | 139.8 | 34.94 -64.06 | 99.00 SHORT |
| PRM | SHAWANO WI | 295 C3 | | 44-45-14 88-20-01 | | 0.00 -153.00 | 153.0 SHORT |
| WUPM LIC | IRONWOOD MI BLH-880929KA | 295 C1 | 100.0 151.0 | 46-28-18 90-00-43 | 325.6 | 231.49 20.49 | 211.0 CLEAR |
| ALLOC ** ORDER | WISCONSIN DELLS WI DCC-90-491 ED FROM CHANNEL 296-A | 295 A ** | | 43-36-50 89-36-26 | 218.8 | 162.53 20.53 | 142.0 CLEAR |
| WFON LIC | FOND DU LAC WI BLH-3824 | 296 A | 3.0 91.0 | 43-53-22 88-22-06 | 181.6 | 101.65 12.65 | 89.0 CLEAR |

TABLE II, CONCLUDED

CHANNEL STUDY

JOB TITLE:

SHAWANO, WISCONSIN

CHANNEL:

295

FREQUENCY:

106.9 MHZ

CLASS:

C3

COORDINATES:

44°-45°-14" N.L. 88°-20'-01" W.L. (WOWN AUTHORIZED SITE) WHEELER BROADCASTING, INC. & MIDWEST DIMENSIONS, INC.

PETITIONERS:

DATE:

NOVEMBER 22'ND, 1992

| CALL STATUS | CITY STATE | FCC FILE | CHAN CLS | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|----------------------------|----------------|---|-------------------|-------------------------|-----------------------|-----------------|----------------|----------------|
| WNNO-FM LIC ** ORDER | WI | IN DELLS BMLH-9001101 ANNEL 295-A | | 3.1 98.0 0-491 ** | 43-38-23 89-43-14 | 218.8 | 162.53 | 142.0 CLEAR |
| PRM | BRILLION WI | N DOC-91-219 | 298 C3 | | 44-19-10 87-57-30 | 148.3 | 56.75 13.75 | 43.0 CLEAR |
| WEZR CP | BRILLION WI | N BMPH-920211 | 298 ID A | 6.0 100.0 | 44-15-27 88-11-43 | 168.7 | 56.22 14.22 | 42.0 CLEAR |
| PRM | BRILLION WI | N DOC-91-219 | 2 98 C3 | | 44-16-30 87-57-30 | 150.7 | 61.01 18.01 | 43.0 CLEAR |

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TABLE III

CHANNEL STUDY

JOB TITLE:

OCONTO, WISCONSIN

CHANNEL:

246

FREQUENCY:

97.1 MHZ

CLASS:

Δ

COORDINATES: PETITIONERS:

44°-52'-18" N.L. 88°-03'-23" W.L. (ILLUSTRATIVE SITE) WHEELER BROADCASTING, INC. AND MIDWEST DIMENSIONS, INC.

DATE:

NOVEMBER 23'RD, 1992

| CALL STATUS | CITY STATE | FCC FILE | CHAN CLS | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | | REQ. (KM.) |
|-------------------------|---------------------------|----------------------------------|--------------------|----------------------|--------------------------------------|-----------------|------------------|----------------|
| WBDK LIC ** ORDER | ALGOMA WI RED TO CH | BLH-861124KB ANNEL 244-C3 B | | 100.0 | 44-39-26 87-33-45 | 121.4 | 45.79 14.79 | 31.0 CLEAR |
| ALLOC | ALGOMA W1 | DOC-89-282 | 244 C3 | | 44-38-08 87-37-37 | 127.7 | 42.95 0.95 | 42.0 CLEAR |
| WBDK APP | ALGOMA WI | BPH-920624IC | 244 C3 | 25.0 86.0 | 44-38-52 87-33-54 | 122.6 | 46.18 4.18 | 42.0 CLEAR |
| ** THIS | | A WOULD MOVE WG LOMETER ** | 245 C LQ TO | | 46-08-04 86-56-52 NEL WHERE IT | | 0.06* | CLEAR |
| WUSW LIC | OSHKOSH WI | BLH-911129KB | 245 A | 6.0 100.0 | 44-06-01 88-32-02 | 203.9 | 93.76 41.76 | 72.0 CLEAR |
| PRM ** THIS | OCONTO WI PROPOSAL | . WOULD ADD THI | 246 A S CHAN | NNEL ** | 44-52-18 88-03-23 | 0.0 | 0.00 -115.00 | 115.0 SHORT |
| LIC | | A WOULD DELETE | | | 46-08-04 86-56-52 | 31.7 | 164.94 -61.06 | 226.0 SHORT |
| WCOW-FM LIC | SPARTA WI | BLH-881215KB | 246 C1 | 100.0 179.0 | 43-58-06 90-51-35 | 245.8 | 244.79 44.79 | 200.0 CLEAR |
| WZTT CP | RHINELA WI | NDER BMPH-8703031P | 248 C1 | 100.0 235.0 | 45-22-43 89-11-38 | 302.2 | 105.75 30.75 | 75.0 CLEAR |
| WFNL LIC | STURGEC WI | N BAY BLH-900619KD | | 2.0 122.0 | 44-54-21 87-22-15 | 86.0 | 54.29 23.29 | 31.0 CLEAR |
| WFNL CP | STURGEO WI | N BAY BPH-9008061E | | | 44-54-21 87-22-15 | 86.0 | 54.29 23.29 | 31.0 CLEAR |

TABLE IV

CHANNEL STUDY

JOB TITLE:

ESCANABA, MICHIGAN

CHANNEL:

245

FREQUENCY:

96.9 MHZ

CLASS:

COORDINATES: PETITIONERS: 46°-08'-04" N.L. 86°-56'-52" W.L. (WGLQ CURRENT SITE) WHEELER BROADCASTING, INC AND MIDWEST DIMENSIONS, INC.

DATE:

NOVEMBER 23'RD, 1992

| CALL STATUS | CITY STATE FCC FILE | CHAN CLS | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | | | REQ. (KM.) |
|----------------|--|---------------------|----------------------|-------------------------------------|-------|------------------------------|----------------|
| PRM ** ADDIT | PESHTIGO WI DOC-91-240 ION OF THIS CHANNEL P | | ** | 45-07-19 87-51-07 | 212.1 | 132.80 27.80 | 105.0 CLEAR |
| WOLF-FM CP | HOUGHTON MI BPH-901218JZ | 242 C1 | 100.0 177.0 | 47-08-06 88-33-53 | 311.9 | 166.44 61.44 | 105.0 CLEAR |
| LIC | ALGOMA WI BLH-861124KB ED TO CHANNEL 244-C3 | | 100.0 | 44-39-26 87-33-45 | | 171.04 76.04 | 95.0 CLEAR |
| WBDK APP | ALGOMA WI BPH-9206241C | 244 C3 | 25.0 86.0 | 44-38-52 87-33-54 | 196.3 | 172.15 -3.85 | 176.0 SHORT |
| ALLOC | ALGOMA WI DOC-89-282 | 244 C3 | | 44-38-08 87-37-37 | 197.7 | 174.87 -1.13 | 176.0 SHORT |
| WWLZ APP | CADILLAC MI BPH-9206021C | 244 C3 | 7.2 184.0 | 44-22-51 85-33-24 | 150.7 | 223.40 47.40 | 176.0 CLEAR |
| ALLOC | CADILLAC WI DOC-90-471 | 244 C3 | | 44-20-25 85-35-34 | 151.9 | 226.01 50.01 | 176.0 CLEAR |
| WGLQ ** THIS | ESCANABA MI PROPOSAL WOULD MOVE W | 245 C GLQ TO | THIS CHANN | 46-08-04 86-56-52 NEL ** | | 0.00 | 290.0 SHORT |
| WUSW LIC | OSHKOSH WI BLH-911129KB | 245 A | | 44-06-01 88-32-02 | | 258.23 32.23 | 226.0 CLEAR |
| PRM ** THIS | OCONTO WI PROPOSAL WOULD ADD TH | 246 A IS CHAN | NEL WHICH | 44-52-18 88-03-23 WOULD CLEAR | | 164.94 -0.06* UNDING U | CLEAR |

THE NEAREST KILOMETER **

TABLE IV, CONCLUDED

CHANNEL STUDY

JOB TITLE:

ESCANABA, MICHIGAN

CHANNEL:

245

FREQUENCY:

96.9 MHZ

CLASS:

COORDINATES:

46°-08'-04" N.L. 86°-56'-52" W.L. (WGLQ CURRENT SITE) WHEELER BROADCASTING, INC. AND MIDWEST DIMENSIONS, INC.

PETITIONERS:

DATE:

NOVEMBER 23'RD, 1992

| CALL STATUS | CITY STATE | FCC FILE | CHAN CLS | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | | REQ. (KM.) |
|------------------------|---------------------------|--------------------|--------------------|-----------------------------|-----------------------|-----------------|-----------------|----------------|
| WGLQ LIC ** THIS | ESCANAB WI PROPOSAL | | 246 C THIS C | 100.0 325.0 HANNEL ** | 46-08-04 86-56-52 | 0.0 | 0.00 -241.00 | 241.0 SHORT |
| WMQT LIC | ISHPEMI MI | NG BLH-850515KC | 298 C1 | 100.0 161.0 | 46-28-42 87-37-21 | 306.3 | 64.52 23.52 | 41.0 CLEAR |

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CERTIFICATE OF SERVICE

I, Bruce Herzog, Broadcast Engineering Consultant for Wheeler Broadcasting, Inc. and for Midwest Dimensions, Inc., hereby certify that I have this Twenty-fifth day of November, 1992, sent a copy of the Comments to the Notice Of Proposed Rulemaking (Docket 92-228) by Wheeler Broadcasting, Inc. and Midwest Dimensions, Inc. by Federal Express to:

Malcolm G. Stevenson Schwartz, Woods & Miller The Dupont Circle Building, Suite 300 1350 Connecticut Avenue, N.W. Washington, DC 20036 Counsel for Michael R. Walton

WGLQ Radio Rick Duerson General Manager 524 Ludington Street Escanaba, MI 49829

WOCO-FM Radio Walter P. Kaszynski General Manager 3829 Highway 22 West Oconto, WI 54153

Bruce Charles Herzog

- Bru C Huzog